

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GLORIA PUMPHREY and ANGALYN JONES, <i>for themselves and on behalf of all similarly situated individuals,</i>)	
)	
)	
Plaintiffs,)	
)	Civil Action No. 3:11cv574
v.)	
)	
EXPERIAN INFORMATION SOLUTIONS, INC.)	
)	
Defendant.)	

PLAINTIFFS' MOTION FOR LEAVE TO DISMISS THEIR COMPLAINT

COME NOW the Plaintiffs, by counsel, and move this Court for leave to dismiss their Complaint pursuant to Fed. R. Civ. P. 41(a)(2) for the reasons more clearly set forth in their supporting memorandum. Plaintiff has conferred with the Defendant and the Defendant has stated its fervent objection to this motion.

Respectfully submitted,
**GLORIA PUMPHREY and
ANGALYN JONES,**
*for themselves and on behalf of all similarly
situated individuals*

By: _____/s/_____
Of Counsel

Casey S. Nash, VSB No. 84261
Counsel for the Plaintiffs
CONSUMER LITIGATION ASSOCIATES, P.C.
1800 Diagonal Road, Suite 600
Alexandria, VA 22314
Tel: (703) 273-7770
Fax: (888) 892-3512
casey@clalegal.com

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of February, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Joseph W. Clark
JONES DAY
51 Louisiana Avenue, NW
Washington, D.C. 20001-2113
Tel: 202-879-3697
Fax: 202-626-1700
jwclark@jonesday.com

Counsel for the Defendant

_____/s/
Casey S. Nash, VSB No. 84261
Counsel for the Plaintiffs
CONSUMER LITIGATION ASSOCIATES, P.C.
1800 Diagonal Road, Suite 600
Alexandria, VA 22314
Tel: (703) 273-7770
Fax: (888) 892-3512
casey@clalegal.com